



January 20, 2020

Ms. Sarah Kirksey – Air Section Manager
Texas Commission on Environmental Quality
Beaumont Regional Office (Region 10)
3870 Eastex Freeway
Beaumont, Texas 77703-1830

**SUBJECT: Annual Monitoring Report under 40 CFR 60, Subpart OOOOa
Gulf South Pipeline Company, LP
Magasco Compressor Station
Regulated Entity Number RN100825454
Permit-by-Rule Registration Number 133637**

Dear Ms. Kirksey:

Gulf South Pipeline Company, LP (Gulf South) is submitting this annual report for its Magasco Compressor Station, located in Sabine County, as required by 40 CFR 60.5420a(b). The address for the facility is 1744 Magasco Drive, Pineland, TX 75968. The front gate for the facility is located at 31.2833° North, 93.9781° West.

This compressor station was initially placed into service on November 1, 2018, which constitutes the beginning of the initial compliance period under Subpart OOOOa pursuant to 40 CFR 60.5410a. This report covers the initial compliance period, which is from November 1, 2018 through October 31, 2019. Pursuant to 60.5420a(b), the report is due within 90 days after the end of the initial compliance period, making the due date January 29, 2020. This submittal is therefore timely.

Construction of this station commenced after September 18, 2015; therefore, the collection of fugitive emission components at the station are considered an affected facility pursuant to 40 CFR 60.5365a(j). As such, the site is subject to the leak detection and repair (LDAR) provisions found in 40 CFR 60.5397a. The affected facility covered by this report is the collection of fugitive emission components at the compressor station. There are no other affected facilities under Subpart OOOOa in operation at the site.

Pursuant to 40 CFR 60.5397a(f)(2), the initial LDAR survey for this facility was due by December 30, 2018. As shown in the attached records, the initial LDAR survey was conducted on December 12, 2018 and subsequent quarterly surveys have been completed as required. Each quarterly survey was separated by at least 60 days pursuant to 60.5397a(g)(2).

The reporting requirements of 40 CFR 60.5420a(b)(7) are all met with this submittal (including attachments). Tables 1 and 2 provide many of the details in conjunction with the information provided in this letter. There are no components at this facility classified as difficult-to-monitor or unsafe-to-monitor; therefore, no monitoring of such components occurred during the reporting period. This statement satisfies 60.5420a(b)(7)(ix).

As reflected in attached Table 2, the single leak detected during the reporting period was repaired in accordance with the timeframes outlined in 40 CFR 60.5397a(h). This repair required depressurization of gas piping in order to safely complete the repair actions; however, that was completed within the 30-day time period. As such, delay of repair was not necessary for this component and the repair was completed in accordance with 40 CFR 60.5397a(h)(2). Details are provided in Table 2.

Gulf South Pipeline Company, LP

9 Greenway Plaza, Ste. 2800 Houston, TX 77046 Tel. 713.479.8000 www.gulfsouthpl.com



Our intent was to file this annual report in US EPA's CEDRI system pursuant to 40 CFR 60.5420a(b)(11). However, according to information posted on the CEDRI site and conversations with US EPA personnel, the CEDRI template is not final at this time and the reporting portal for Subpart OOOOa is therefore not open. The portal likely will not reopen until the current rule reconsideration process has been completed. US EPA instructed us to file the report as we would other compliance reports until such time as the CEDRI template is finalized and the reporting portal is opened.

Gulf South is committed to maintaining its operations in compliance with all state and federal regulations. To the best of our knowledge, there have been no deviations from the requirements of 40 CFR 60, Subpart OOOOa at this facility during the reporting period. Please contact me at david.nickel@bwpmlp.com or (903) 753-7209 (extension 2926) if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "David Nickel".

David Nickel
Environmental Specialist

Attachments

cc: TCEQ Central Office
US EPA, Region VI (Submitted electronically to R6WellCompletion@epa.gov)
Magasco Compressor Station (Air Files)

Table 1
Summary of LDAR Monitoring Surveys

Company Name: Gulf South Pipeline Company, LP

Facility Name: Magasco Station

Reporting Period: November 1, 2018 through October 31, 2019

Reporting Requirement Citation; 40 CFR 60.5420a(b)(7)

(i)	(ii)	(ii)	(iii)	(iii)	(iv)	(iv)	(iv)	(v)	(vi)
Survey Date	Beginning Time	Ending Time	Name of Camera Operator	Training and Experience	Ambient Temperature (F)	Sky Conditions	Max Wind Speed (mph)	Monitoring Instrument Used	Any Deviations from Monitoring Plan? If so, describe
12/12/2018	8:45 AM	10:30 AM	Steve Tiemann	Trained thermographer with 12 years of experience operating OGI camera	62	Partly Cloudy	3	FLIR Model 320 Optical Gas Imaging Camera	No
2/13/2019	8:30 AM	10:00 AM	Bud McCorkle	Trained thermographer with 13 years of experience operating OGI camera	51	Sunny	0	FLIR Model 320 Optical Gas Imaging Camera	No
5/9/2019	1:30 PM	3:30 PM	CR Thompson	Trained thermographer with 8 years of experience operating OGI camera	83	Mostly Cloudy	2	FLIR Model 320 Optical Gas Imaging Camera	No
9/25/2019	7:30 AM	9:30 AM	CR Thompson	Trained thermographer with 8 years of experience operating OGI camera	72	Sunny	0	FLIR Model 320 Optical Gas Imaging Camera	No

Table 2
Summary of Leak and Repair Data

Company Name: Gulf South Pipeline Company, LP

Facility Name: Magasco Station

Reporting Period: November 1, 2018 through October 31, 2019

Reporting Requirement Citation: 40 CFR 60.5420a(b)(7)

		(vii)	(x)	(viii)	(xi)	(xi)	(xii)
Leak #	Date Discovered	Component Type	Successful Repair Date	Repaired As Required in 60.5397a(h)?	Was Delay of Repair Necessary?	Explanation for Delay of Repair (if necessary)	Repair Verification Method
Initial survey conducted on 12/12/18. No leaks were found.							
1Q19 survey conducted on 2/13/19. No leaks were found.							
2Q19 survey conducted on 5/9/19. No leaks were found.							
1	9/25/2019	Connector	10/17/2019	Yes	No	-	Soap Bubbles

	(vii)	(vii)	(viii)	(xi)	(xi)
Survey Date	Component Type	Leaking Components Detected	Not Repaired As Required in 60.5397a(h)	Placed on Delay of Repair	Explanation for Delay of Repair (if necessary)
9/25/2019	Connector	1	0	0	-

Note: There were no components on delay of repair at the end of the reporting period.

40 CFR 60, Subpart OOOOa Annual Report Certification Statement

I, the undersigned, qualify as a certifying official pursuant to 40 CFR 60.5430a and hereby certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document and its attachments are true, accurate and complete.



Dave Perkins
Vice President – Environmental, Safety, and Security

Date: January 20, 2020